

FM 05-98 Attachment III

CG1: How does a private entity apply for competitive grant funds?

A: The WtW Regulations state that a private entity may apply for a WtW competitive grant if they include a signed certification that the PIC or political subdivision was consulted in the development of the application, and that the activities proposed are consistent with and will be coordinated with the efforts of the PIC/political subdivision

CG1a: What if the PIC/political subdivision will not provide certification?

A: If the PIC/political subdivision will not agree to provide certification that the proposal was developed "in conjunction", then the applicant must describe efforts that were taken to coordinate with the PIC/political subdivision and include information indicating that the PIC/political subdivision was given a sufficient opportunity to review and comment on the proposal. Sufficient opportunity to comment means at least a 30 calendar days.

CG1b: Under what circumstances does the 30-day review and comment period apply?

A: The 30-day review and comment period applies where the applicant has adequate reason to believe that the relevant PIC/political subdivision will not certify that the applicant has consulted with them and that the proposed activities are consistent with and will be coordinated with PIC/political subdivision WtW efforts.

CG2: Can I apply for a WtW Competitive grant if I am administering a WtW formula program?

A: Yes. WtW Competitive grants to local communities are expected to complement the services and activities to be provided under the formula grant program. Private Industry Councils or other local administering entities are encouraged to apply for grant funds.

CG3: Can the 7.5 percent excess poverty rate be applied to a smaller area than the whole city?

A: Yes. WtW competitive grants are targeted to local communities and, within that, to pockets of poverty within a community. The application should demonstrate in as much detail as possible the level of need in the specific target population to be addressed.

CG3a: Where can I find information on the poverty rates in my local area?

A: Information broken down to the city and county level is available in the 1994 City/County Data Book, published by the U.S. Census Bureau. This book should be available in the reference section of all local libraries. For information at a sub-city or county level, applicants should consult with the local city or county planning agency, or State university to obtain 1990 U.S. Census data. Census information down to a census tract or block level is also available at the nearest Government Repository. Lists of government repositories can be found at <http://drseuss.lib.uidaho.edu:80/govdoc/otherdep.html>.

CG4: Why is profit not allowed for WtW competitive grants?

A: WtW competitive grants present an opportunity for private "for-profit" entities to collaborate with non-profit organizations as well as public agencies to provide effective services for hard-to-employ welfare recipients. To a certain extent, competitive grant funds will subsidize the research and development activities of "for-profit" entities, enabling them to test experimental employment strategies at no cost to themselves. "For-profit" entities are welcome to use the knowledge and experience they gain in profit-making enterprises funded through other sources, but the Department feels it is reasonable to disallow the earning of profit on competitive grant funds.

CG5: If I am in a city that has a population of less than 50,000 population, are we rural or urban?

A: In the SGA for WtW Competitive grants, a county that does not contain an urban center of more than 50,000 people is defined as rural. An applicant that is unsure of whether they are urban or rural should choose a designation based on the nature of the services to be provided in their WtW proposal. A proposal which focuses on services to a rural population should be designated as rural and should make the strongest case possible for the proposed services. If the proposal plans to target residents of an urban center, the proposal should establish that the urban center contains large concentrations of residents with income that is less than the poverty line.

CG6: Can I submit more than one application?

A: Yes. Any organization can submit multiple applications in multiple funding cycles. All applications from entities other than PICs and political subdivisions must, however, meet the requirements for consultation and coordination with the PIC/political subdivision. and must demonstrate a relationship to the corresponding WtW formula grant program at the State and local level.

CG7: Are matching funds required for WtW competitive grants?

A: No. The matching requirement for WtW funds only applies to the WtW formula grant program. Collaboration with other organizations and the leveraging of outside resources are strongly encouraged, however, as part of the WtW competitive grant program. Such leveraged resources should be reflected in both the project narrative and the budget portion of the competitive grant application.

CG8: What are "Community saturation projects"?

A: Community saturation projects are projects that propose to serve 100 percent of the eligible population within a designated service area, i.e. the community is completely "saturated" with services.

CG8a: How does community saturation apply to large cities?

A: In general, the funds available through the WtW program are not sufficient to serve the substantial numbers of participants that would be eligible within a city with a large concentration of poverty. However, projects designed to serve targeted communities, neighborhoods, or even blocks within a large city could certainly consider implementing a saturation strategy within that section of a city.

CG8b: How is participant eligibility determined in community saturation projects?

A: The eligibility requirements for community saturation projects are the same as those for other WtW projects. An application proposing to employ a community saturation strategy would provide services to 100 percent of the eligible WtW individuals in the project service area.

CG9: Can I provide skill training to participants prior to placing them in a job?

A: As indicated in the WtW Interim Final Rule (20 C.F.R. 645.220), basic educational skills training, occupational skills training, and English-as-a-second-language training are allowable activities, but only as post-employment services. On-the-job training is allowable as an employment service.

CG10: How do I find my local PIC?

A: PICs and JTPA Service Delivery Areas can be reached from the Employment and Training Administration's Welfare-to-Work Homepage. Click on the "Contacts" button at the top of the page. Identify the State you are interested in, and select "Service Delivery Areas" under Directory Name. You should be able to find the appropriate local organization from that list.

CG11: Does the 70 percent eligibility requirement apply to competitive grants?

A: Yes. As indicated in the Preamble to the WtW Interim Final Rule (62 FR 61591), at least 70 percent of WtW funds, whether distributed through formula grants or in competitive grants, must be spent to benefit hard-to-employ individuals, as described at 20 C.F.R. 645.211.

CG12: Is it allowable for WtW grants to pay medical expenses that are not covered by Medicaid?

A: No. As indicated in the Preamble to the WtW Interim Final Regulations (62 FR 61595, 11/18/97), Section 408 (a)(6) of the Social Security Act, which bars the use of Federal TANF funds for medical services, also applies to WtW funds.

CG13: Should I include letters of support from my partner organizations?

A: No. The SGA indicates in Part II of the Required Content for Welfare-to-Work Competitive Grant Applications that general letters of support should not be included. If the applicant feels that it is important to include letters of support, they should be included as attachments and will count against the 25 page count limit. In general, support from partner organizations should be indicated elsewhere in the narrative and budget portions of the proposal, rather than through letters of support. Letters of support may also be submitted under separate cover

CG14. Are States eligible to apply for competitive grants in conjunction with a political subdivision or PIC as "private entities?" (2/20/98)

A. In general, states are not able to apply for competitive grants. The definition of "private entity" in the WtW solicitation for grant applications encompasses public or private organizations other than political subdivisions and PICs. The competitive grant Solicitation for Grant Applications indicates a focus on "moving eligible individuals into unsubsidized employment in a local, community-based context." Therefore, those State entities, such as community colleges, that operate at the local level would be eligible to participate in the competitive grant program.

By contrast, a State agency operating at the State level would not be eligible to apply for a competitive grant. Further, given the consultative role assigned to the State Governors under the WtW legislation and implementing regulations, Governors and any State agencies that would be involved in the consultation process would be ineligible to apply because of the potential for conflict of interest.

CG15: What is the Code of Federal Domestic Assistance Number (CFDA) for the Welfare-to-Work Competitive grants? (3/4/98)

A: The CFDA number for the WtW Competitive grants is 17-253, the same as for the overall WtW program. It can be found in Section VII of the Preamble to the Welfare-to-Work Interim Final Rule (62 FR 61603).

CG16. What were the most common weaknesses identified in the Round One WtW Competitive Grant proposals? (5/18/98)

The most common weaknesses in Round One proposals were:

- Poor understanding and implementation of the "work first" philosophy;
- Applicaton formatted in a manner that does not match the SGA requirements;
- No clear identification of the innovative elements in the proposal;
- Poor documentation of State and local consultations;
- Insufficiently demonstrated coordination with local TANF agency; and,
- Little evidence of leveraged resources.

Applicants for Round Two of the WtW competitive grants should read the April 15, 1998 Federal Register Solicitation for Grant Applications carefully to ensure that their applications meet the revised requirements.